

# **THE TRIBAL AIR GRANTS FRAMEWORK**

## ***A MENU OF OPTIONS***

**For Developing Tribal Air Grant Work Plans and  
Managing Grants for Environmental Results**

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# **The TRIBAL AIR GRANTS FRAMEWORK:**

## **A Menu of Options**

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# **TRIBAL AIR GRANTS FRAMEWORK: A MENU OF OPTIONS**

**for**

***Developing Tribal Air Grant Work Plans and Managing Grants for Environmental Results***

## **INTRODUCTION:**

The Environmental Protection Agency (EPA) is committed to working with tribes to develop and to implement Clean Air Act (CAA) programs in Indian country. One of EPA's primary tools in this effort is to award CAA grants in order to help build tribal knowledge and increase tribe's capacity to manage air quality issues. CAA §103 and §105 allow EPA to provide grant support to tribes for this purpose. To assist tribes in writing effective grant applications and work plans, we have developed this "Tribal Air Grants Framework: A Menu of Options."

The purpose of this tool is to assist tribes that apply for CAA funding to draft more effective work plans for projects that will develop tribal knowledge of air quality issues and build tribal expertise to manage air quality on reservations.

The CAA envisions an approach to air quality management that includes:

- Goals and standards to protect public health and the environment
- Assessing air quality through emissions inventories and monitoring
- Determining necessary reductions in pollution
- Federal, State or Tribal Implementation Plans
- Education or outreach programs and other voluntary measures
- Implementing and enforcing control measures

Tribal air programs, like their state counterparts, may include activities that involve different elements of this framework. However, unlike the states, the tribes often do not have resources available to build and run their own CAA programs. Instead the CAA provides mechanisms to allow them to develop their capacity, authority, regulations, and other components on an incremental and as-needed basis. These menu options suggest some of the more common activities involved in achieving primary air quality objectives. Tribes can select the work that is most appropriate considering their individual circumstances and needs.

Approvable work plans need to have (1) one or more ***objectives***, (2) ***activities*** that support the achievement of the ***objectives***, and (3) ***outcomes*** or ***deliverables*** that will produce ***environmental results*** within the objective. Therefore, each menu is structured to provide suggestions for all of these critical work plan elements. The menus also include ***performance measures*** ("Nationally Reportable Outcomes") that will allow national tracking of tribal environmental accomplishments. Through the grant negotiation process, applicants will produce work plans with supporting budgets that will address both the needs of the particular reservation or tribal community, as well as EPA priorities.

While funding limitations and other considerations of the grant process prevent any guarantee that a particular grant proposal will be selected for funding, it is hoped that these menus will help tribes efficiently develop proposals that can effectively address air quality issues in Indian country from initial assessment of air pollution sources to advanced regulatory development and implementation. This guidance is intended to serve as a reference for both tribal and EPA staff during CAA grant and program development.

The menus do not represent the *only* categories of work that EPA will fund under the CAA authorities, nor are the activities necessarily the only ones that will lead to achieving the given objectives. However, the framework is intended to provide options that will be useful to tribes in developing work plans both for assessing their air quality and in building the capacity to manage a reservation's air quality. It is also hoped that the use of this tool will help streamline the EPA review of work plans and help us to better assist tribes in managing CAA grants

Before submitting an application, applicants are encouraged to contact their EPA Region for information on applicable procedures before developing a work plan and supporting budget around the air quality objectives for which they seek funding. Additionally, the tribe and Project Officer will normally negotiate final work plan deliverables and budget amounts prior to the tribe submitting a signed, formal application in response to a particular Region's grant announcement.

**Note:** Many of the activities and objectives included in these menu options may also be appropriate for work plans funded under other grant opportunities, e.g. the Indian General Assistance Program (GAP). Contact the EPA Tribal Office in your Region for further information.

**MENU ITEM: *Administration and Infrastructure Development***

**OBJECTIVE:** Develop and maintain the requisite staff, infrastructure and administrative capacity needed to accomplish air quality activities of the current grant work plan.

**ACTIVITIES / TASKS:**

Note: The following tasks are options for grant applicants to consider in developing a work plan that includes this objective. They should be modified and augmented, as necessary, to suit the particular needs and circumstances of the grant applicant.

- Write job/position descriptions for staff that will be needed to accomplish work plan tasks and objectives.
- Identify and hire appropriate personnel, either from existing tribal staff or new hire, with background and/or potential to be able to handle activities in work plan.
- Arrange for office space and equipment sufficient to accomplish the work plan activities.
- Set up a record keeping system for grant and air related activities, including tracking of grant terms and conditions, fiscal data, equipment, timekeeping records, work plan performance, milestones, and deliverables.
- Identify training needs of staff and write a training plan; make necessary arrangements for registration and attending the appropriate classes.
- Attend training courses, workshops and conferences that will provide background and skills to accomplish the work plan.
- Make contacts with other tribes, state and local air professionals, through tribal, local, regional and national organizations and conferences that will provide sources of support and collaborative efforts that can help with air quality work on the reservation, particularly surrounding jurisdictions in the same or neighboring air sheds.
- Write quarterly reports, comparing activities and accomplishments with work plan milestones, timeline, and objectives, to ensure that work progresses at a rate that will allow completion of the deliverables within the project period. If problems are encountered that may prevent progress, promptly notify the grant project officer and discussing how the problems will be addressed.
- Communicate regularly with tribal grants and fiscal personnel involved with submitting the financial reports for the grant to ensure that all appropriate records are being maintained and reports, such as Reimbursement Requests and Financial Status Reports, are submitted appropriately and according to the terms of the grant.

**DELIVERABLES:**

- Staff hired appropriate to the job description with the capabilities to complete the work plan activities by the end of the project period, given appropriate training.
- Training plan written that supports the work plan objectives.
- The training courses, identified as necessary for the staff to develop the capacity to carry out the work plan objectives, are satisfactorily completed.
- Office management and administrative procedures established and maintained that ensure that all needed records are kept, that grant terms and conditions are satisfied, such as submission of quarterly Progress Reports and annual Financial Status Reports, and agreed outputs provided to EPA.

**NATIONAL REPORTABLE OUTCOMES**

- Number of tribes who have demonstrated successful grant management and air project management capabilities through the timely compliance with all grant terms and conditions and completion of work plan deliverables. [Or other indicator of the capacity demonstrated for successful environmental grant management for achieving the goals of the Clean Air Act in Indian country.]



**MENU ITEM: *Basic Air Quality Assessment***

**OBJECTIVE:** To identify the existence of and possible sources of air pollution that may be of concern to the tribe and reservation communities, identifying any need for and nature of further air quality work.

**ACTIVITIES / TASKS:**

*Note:* The following tasks are options for grant applicants to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

**Conduct source inventory and categorization:**

- **Training:** Obtain training related to basic air quality assessment issues.
- **Identify *stationary sources*** through such activities as:
  - Phone book review of businesses operating on the reservation.
  - “Windshield survey” of businesses operating and activities on the reservation and other reservation characteristics that influence air quality.
  - Contact neighboring jurisdictions for relevant information.
- ***Area and mobile sources:*** Identify the major types of area and mobile sources, such as agricultural practices, forestry burning, wood stoves, vehicle counts, unpaved roads, etc.
- ***Smoke management*** issues: Is there agricultural or forestry burning on or near the reservation that impacts the reservation communities? Is there a smoke management program for agricultural or forestry burning? If so, contact managers and determine what procedures and equipment are used in the management.
- **Contact surrounding jurisdictions:** For sources off reservation that may impact air quality on the reservation. [Are there common air quality issues that should be addressed with any of the surrounding jurisdictions?]

**Track and evaluate air quality complaints:**

- ***Research past history of air quality complaints:*** Contact relevant tribal and local offices (e.g. environmental or resource management, public health, hospitals, neighboring state/local/tribal air quality offices) that may have received complaints about air quality problems. Identify how many over what period of time, time of year, possible causes that may be generating the problem.
- ***Establish a system for tracking air quality complaints*** that will provide ongoing information on the type and severity of air quality problems of greatest concern to the residents of the reservation.
- ***Indoor Air Quality:*** Contact housing, health and other relevant tribal departments to document whether there has been a history of complaints associated with indoor air. Contact EPA Regional IAQ for information on available assistance for such complaints and training that may be available.

### Evaluate Monitoring Needs:

- *Existing or past monitoring:* Determine whether there has been or is currently any air quality monitoring conducted on the reservation, its type and what the data collected has shown about air quality.
- *Off reservation monitoring:* Identify any off reservation air quality or meteorological data monitoring that may be collecting useful information for the reservation and arrange to meet with the responsible agency to learn and establish an information sharing agreement, as appropriate.

### **DELIVERABLES:**

- Report identifying: number and type of businesses, their locations, potential air pollution produced, and the significant characteristics of the reservation that should be considered in evaluating air pollution issues. Report should include a map, if possible, with significant sources, population centers, and relevant reservation characteristics annotated.
- Identify need for additional air quality activities such as a smoke management plan for agricultural or forestry burning, regulatory development, education and outreach, indoor air quality assessments, or other targeted projects.
- Report of history and nature of air quality related complaints identified through tribal agencies and other contacts.
- Summary of what has been learned about indoor air-related complaints on the reservation, including number, type, and possible causes.
- Written evaluation of additional data that would assist in more completely evaluating air quality problems, such as emission inventory or monitoring, including the type and how such additional data would be used to inform air quality management decisions.

### **NATIONAL REPORTABLE OUTCOMES:**

- Number of tribes who have completed a basic evaluation of all sources of air pollution on the reservation supported by a report summarizing these and identifying what the tribe considers may be the major sources of concern, if any.
- Number of reservations for which an air quality assessment has been completed.
- Number of tribes that have assessed existence and nature of IAQ problems.

**MENU ITEM: *Participation in Regional & National Policy Groups***

**OBJECTIVE:** To actively participate in appropriate policy groups working on air quality issues by attending meetings and contributing to group objectives.

**ACTIVITIES / TASKS:**

*Note:* The following tasks are options for grant applicants to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- Participate in Regional Planning Organizations (RPOs), national tribal organizations/forums/workgroups, or other tribal, local, state, regional or national/EPA organizations, such as: National Tribal Air Association, EPA's 8 Hour Ozone Designations Workgroup, RTOCs, or NTOCs, the TAMS Steering Committee, etc.
- Select a particular work group of an air related organization that tribal professional can join and commit to actively become involved. Commit to a specific amount of time that will be devoted to this participation or percentage of work under the grant.
- Periodic reports on contributions made to the group and information and issues addressed in the group to EPA and the tribal council and community, as a means of building tribal capacity to understand broader air quality issues and participate in policy development.

**DELIVERABLES:**

- Report of meetings attended and subjects addressed at each, as well as how this information was then communicated to the tribal government and/or community, including at council meetings, powwows, schools, or similar events.
- Quarterly and final grant reports would include documentation of participation, including details of participation in the various groups, the nature of participation, decisions or policy developed through participation and noteworthy contributions.

**NATIONAL REPORTABLE OUTCOMES:**

- Number of tribes and tribal professionals actively participating in national/regional air organizations and air policy work groups that are impacting how air quality issues are being addressed.
- Record of noteworthy contributions to policy development by tribal professionals.

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**MENU ITEM: *Emissions Inventory***

**OBJECTIVE:** To prepare an emissions inventory for a geographic area within the boundaries of or affecting a tribal reservation or community.

**ACTIVITIES / TASKS:**

*Note:* The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- Obtain emission inventory development training.
- Conduct a source inventory [Review and describe on-reservation pollution sources. Identify applicable CAA requirements, if any. Write a report documenting sources identified.]
- Conduct a source categorization.
- Prepare Inventory Preparation Plan (describing what inventory will cover and how it will be developed) for EPA review.
- Conduct emissions inventory according to EPA-reviewed Inventory Preparation Plan
- Prepare draft emissions inventory report for EPA review.
- Prepare final emissions inventory report.
- Evaluate the significance of the sources and emissions, including implications for monitoring or regulatory program, noticing significance of and possibly a comparison to any nearby attainment/nonattainment areas.
- Submit inventory data to National Emissions Inventory database.

**DELIVERABLES:**

- Source inventory report
- Inventory Preparation Plan.
- Draft emissions inventory report.
- Final emissions inventory.
- Submission of inventory data to National Emission Inventory database.

**NATIONAL REPORTABLE OUTCOMES:**

- Number of Tribes that have completed basic source inventory.
- Number of reservations or tribal communities for which emissions inventories have been submitted to the National Emission Inventory database.

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**MENU ITEM: *Indoor Air Quality Assessment and Training***

**OBJECTIVE:** To assess the extent of indoor air pollution in tribal buildings and respond to complaints, to evaluate the potential relation of adverse health impacts to poor IAQ, and to provide training for professionals and members of the public on IAQ issues.

**SUGGESTED ACTIVITIES / TASKS:**

*Note:* The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- Obtain assistance and/or training on conducting IAQ assessments and community outreach.
- Conduct basic investigations of tribal homes and buildings; conduct walkthrough inspections that are primarily observational looking for pollutant sources, water and moisture problems, ventilation, hygiene, bio-contaminants, and observations about temperature and humidity, etc. Checklists may be beneficial to this effort. A Quality Assurance Plan may be required, depending on the extent of any monitoring pursued.
- Gather information about health issues related to IAQ in tribal buildings or housing.
- Provide extensive indoor air training for facilities, health, and environmental staff, including common pollutants, health effects, prevention, assessment, and clean up.
- Provide training to building inhabitants/members of the public on IAQ issues, including common pollutants, health effects, prevention, assessment, and clean up. Focus on what a building occupant can do to prevent IAQ problems.

**Note:** *Remediation* work that may be needed to resolve IAQ problems is typically not a fundable activity under CAA grants. However, plans for *how* needed remediation will be accomplished should be considered in developing an indoor air quality program. Many needed changes can be accomplished easily by the building owner. Also, there may be other funding sources available to implement more major renovations required.

**DELIVERABLES :**

- Report the number of homes assessed for IAQ pollutants and concerns, including a summary of all data and ongoing concerns or issues identified.
- Summary of health issues related to IAQ in tribal buildings.
- Report number of trainings or workshops held for tribal staff or professionals and community members of the public, including number of attendees. Include a course evaluation and a summary of evaluation results.
- Report on any available data that indicates improvement in indoor air quality, health outcomes, behavior changes as a result of grant-funded work.

**NATIONAL REPORTABLE OUTCOMES:**

- Number of reservations or tribal communities where tribes who have conducted IAQ assessments/training were provided.
- Statistics and reported results, including statistics such as number of individuals reached, homes and/or tribal buildings assessed and problems subsequently remedied.



## **MENU ITEM: *Air Quality Monitoring Activities***

**OBJECTIVE:** To identify through collection of quality assured monitoring data the nature and level of air pollution on a reservation or in a tribal community over a particular period of time.

### **ACTIVITIES / TASKS:**

*Note:* The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- **Need and Type of Monitoring Data Identification:** Identify most appropriate type of monitoring data to collect: Learn what other monitoring is being conducted by surrounding jurisdictions and what the data shows. Through information from basic air quality assessment activities, evaluate the possible options for additional air quality data that could assist the tribe in managing its air quality or assisting other jurisdictions in managing air quality.
  - Mini-vol or high-vol Particulate Matter (PM) monitors are best for initial PM monitoring
  - PM 10 or 2.5: either continuous or filter-based Federal Referenced Monitors (FRMs)
  - Meteorological data needs
  - Other criteria pollutants or hazardous air pollutants (HAPs)
- **Training:** Obtain training on topics related to Quality Assurance Project Plans (QAPPs) and appropriate monitoring.
- **QAPP and Siting:** Prepare a QAPP for the type of monitoring determined with EPA assistance that will provide air quality data useful to the tribe, the air shed, or region. QAPP will provide basis for siting the monitor(s) and procedures to be followed to ensure quality of data collected.
- **Saturation Study:** Conduct a saturation study with mini-vol monitors to determine the existence and location of zones of elevated air pollution.
- **FRM PM Monitor:** Based upon the Quality Assurance Project Plan (QAPP) and EPA-approved siting, install and operate the filter-based monitor for appropriate period of time. As data is collected, provide written analysis of what the data indicates about air pollution levels.
- **Continuous Monitoring for PM:** Based upon types of sources identified on the reservation, continuous monitoring may be used to provide ongoing information about sources that produce peaks in air pollution, such as agricultural burning or forestry burning. Data can be provided on a real time basis to reservation communities for decisions about residential burning, or health concerns. Linking to a tribal web page is an optional way of disseminating the data.
- **Meteorological Stations:** When appropriate and based on an EPA-approved QAPP, install and operate a met station in conjunction with monitoring equipment to provide additional

information about the sources of air pollution or to help assist in forestry or agriculture smoke management plans.

- Other Monitoring: When appropriate conduct other criteria pollutant or HAPS monitoring subject to EPA-approved QAPP.
- Provide AQ Data to EPA: The quality assured data should be uploaded into the EPA AQS system or provided to EPA in other applicable format on a quarterly basis.
- Baseline Data: Once a baseline is established for the air pollution levels, assess need for ongoing monitoring in a written report.
- Interim Reports of Air Quality Data: Provide EPA and Tribe information on what levels of air pollution the monitors show on a regular basis.

#### **DELIVERABLES:**

- Quality assured data provided to EPA and, as appropriate, uploaded into the AQS database.
- A report analyzing the air quality data for EPA and the Tribe, providing information such as how the data compares to NAAQS limits, identification of the impacts of particular sources on or off the reservation.

#### **NATIONAL REPORTABLE OUTCOMES:**

- Percentage of reservations (or communities in Indian country) with potential air quality problems that have been assessed or monitored.
- Number of tribes operating particular types of monitors on their reservations where potentially impacted by the pollutant and providing the data to AQS.
- Reports on how tribes have used assessment or monitoring data to better manage their air quality.
- Percentage of reservations for which air quality levels relating to particular NAAQS pollutants has been determined through monitoring, modeling, or other assessment activities.

**MENU ITEM: *Participation in Air Quality Management***

**OBJECTIVE:** To participate in the management of air quality on reservations through inherent tribal authority and applications for CAA Eligibility Determinations for Treatment in the Same Manner as a State (TAS).

**ACTIVITIES / TASKS:**

*Note:* The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- Participate in public notice and comment process for Title V permits.
- Request redesignation of reservation to Class I status.
- Participate in training for Title V permit review (e.g., citizen training, Institute for Tribal Environmental Professionals).
- Preparation of TAR application following TAR guidance with or without desired TAS applications.\*
  - TAS for Section 105 grant authority
  - TAS for “affected state” status under Title V
  - TAS for Section 123 (Interstate Pollution Abatement).
  - Other CAA non-regulatory programs

\* Gives tribal programs federal authority and backing, however tribes have the inherent authority to develop regulations in an Air Quality Management Program without federal authority and backing, if they choose.

**DELIVERABLES:**

- Comment letters on Title V permits.
- TAR/TAS application submitted to EPA.
- Demonstrated reduction in pollution.
- Running or participating in voluntary programs for air quality management, e.g. smoke management, backyard burning outreach program, etc..

**NATIONAL REPORTABLE OUTCOMES:**

- Number of Tribes who have commented on Title V and NSR permits.
- Number of Tribes who have requested eligibility status under the Tribal Authority Rule (TAS).
- Number of Tribes who have been determined eligible for delegation of some CAA Section under the Tribal Authority Rule.



**MENU ITEM: *Local or Unique Air Quality Issues***

**OBJECTIVE(s):** To identify special or unique local air quality issues, their impact on human health and the environment, options for addressing the concerns identified, and, as appropriate, implementing solutions.

**ACTIVITIES / TASKS:**

*Note:* The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- Based upon an initial air quality assessment (See menu topic: “Basic Air Quality Needs Assessment”), evaluate the existence and significance of any unique air quality issues or concerns, through conversations with community, managers, council, adjoining air quality jurisdictions, EPA and other federal agencies, and other appropriate sources. Such unique concerns may include: open burning of solid waste, agricultural field burning, forestry prescribed-burning, burn barrels, burning for land-clearing, and others.
- Network with others involved in addressing the same problem such as the solid waste program. Participate in policy groups that may exist for developing a regulatory response.
- Attend training to understand the causes and possible solutions to the problem.
- Provide education and outreach to the reservation community and tribal leadership on the issue, impact on tribe, and options for responding to the problem. Determine public and tribal position on the seriousness of the problem to the community, preferred responses, priority among other environmental and air quality concerns.
- Develop recommended approach to mitigating or monitoring the problem in the future.
- If regulatory response is an option, develop a plan for instituting a regulatory response and subsequent enforcement.
- For burning on Indian-owned land that is not on the reservation (e.g., land clearing for off-reservation casino development), evaluate the affected state’s open-burning rules and consider them as guidelines for Tribal activities.

**DELIVERABLES:**

- Report analyzing the nature of the problem, its impact on human health and environment on the reservation, and sources of information used to identify the problem and its potential impact.
- A report on the networking conducted, policy groups and other agencies contacted, meetings attended, membership in policy groups and outcomes from such connections.
- Report on courses attended and how information gained was useful or not to understanding the problem and potential solutions.
- Report on education and outreach conducted and what was learned about the various positions held with regard to the air quality problem. This could include number of pamphlets distributed, number of speaking engagements, and changes to school environmental curricula.
- Report evaluation options for addressing the problem and any recommended option including why. This should include coordination with the Tribe's solid waste management program. Should include documentation of the report being presented to tribal leadership and their response.
- Report on any regulatory type activities, copies of regulations proposed or passed records of enforcement, improved practices, and any evidence of mitigation of the problem.

**NATIONAL REPORTABLE OUTCOMES:**

- Number of tribes that have participated in addressing a particular air quality concern and the nature of participation.
- Instances where tribal effort on a local issue has made a documented impact in its being addressed, either by the tribe, or other state, local or federal agencies. For example, creation of an ongoing work group that developed a new strategy for dealing with the problem that became a model for others.
- Reduction in the number of complaints received regarding outdoor burning practices.

**MENU ITEM: *Rulemaking and Enforcement***

**OBJECTIVE(s):** To reduce emissions of criteria pollutants or air toxics by setting and enforcing emission standards/work practice requirements for stationary, area and/or mobile sources of air pollution on tribal lands.

**ACTIVITIES / TASKS:**

*Note:* The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- Preparation of delegation request for federal regulations (such as Part 71, PSD, NSPS, NESHAP, MACT, etc.) following delegation guidance
  - Adopt and implement regulations with emission standards or work practice requirements for:
    - stationary sources (e.g., reasonably available control technology or RACT standards for NO<sub>x</sub> and VOC sources)
    - area sources (e.g., burn barrel restrictions, asbestos demolition work practice standards, waste dumping restrictions)
    - mobile sources (e.g., idling prohibitions, motor vehicle inspection and maintenance requirements)
  - Adopt and implement New Source Review (NSR) permit regulations for major or minor stationary sources
  - Adopt and implement Title V permit program regulations
  - Adopt and implement source-specific regulations to restrict potential emissions
  - Preparation of TIP following TIP guidance.\*
    - regulatory programs
    - source specific programs
    - area-wide limits/controls
    - mobile source issues
    - point source issues (e.g., burn barrel restrictions)
    - inspection/enforcement
    - NO<sub>x</sub> attainment strategies
    - source pre-construction permits
    - regional haze plans
  - Operate an air enforcement program:
    - Plan enforcement activities and target inspections/investigations
    - Conduct inspections and draft inspection reports
    - Review compliance certifications and stack test or continuous emission monitor (CEM) reports
    - Issue notices of violations (NOVs), administrative orders or administrative complaints
    - Negotiate settlements or proceed with enforcement actions
- \* Gives tribal programs federal authority and backing, however, tribes have inherent authority to develop regulations in an Air Quality Management Program without federal authority and backing, if they choose.

**DELIVERABLES:**

- Regulations codified or ordinances enacted by Tribal government.
- Inspections completed
- Enforcement actions taken (e.g., number of NOVs, administrative orders or complaints)
- Number of tons/pounds removed from the air as result of promulgated regulations
- Dollars in penalties collected or dollars in environmentally beneficial supplemental enforcement projects (SEPs) completed
- TIP submitted to EPA.
- Delegation request submitted to EPA.

**NATIONAL REPORTABLE OUTCOMES:**

- Number of tribes who have enacted tribal air quality regulations or ordinances.
- Number of tribes who have submitted a Tribal Implementation Plan (TIP).
- Number of Tribes who have been granted an approved TIP.
- Number of tribes assisting with implementation of Federal Implementation Plans or other regulations.
- Number of Tribes who have requested delegation of a Clean Air Act regulatory program.
- Number of Tribes who have been granted delegation of a Clean Air Act regulatory program
- Number of tribal air quality enforcement actions taken.
- Number of tons/pounds removed from the air as result of tribal regulations
- Dollars in penalties collected by tribes or in environmentally beneficial SEPs completed



## **Glossary of Terms and Acronyms**

**Area Sources:** Sources, either facilities or activities whose individual emissions do not qualify them as point sources.

**AQI:** *Air Quality Index* Used to inform the public about the potential health impacts of ambient air quality at a particular time and location.

**CAA:** *Clean Air Act.* Federal Laws enacted to improve the air quality or prevent its deterioration so that it is not a danger to public health and welfare. 42 United States Code §§7401 et seq.

**EI:** *Emissions Inventory* A detailed listing of pollutants emitted from specific sources in a defined area. EIs can include *point sources*, *area sources* and *mobile sources*.

**EPA:** *Environmental Protection Agency* Executive Branch agency responsible for implementation and enforcement of the CAA and other environmental statutes.

**FIP:** *Federal Implementation Plan* Federal rules in the Code of Federal Regulations that are established to manage air quality on one or more reservations.

**HAP:** *Hazardous Air Pollutant* An air pollutant (other than the six criteria pollutants) that is regulated through control measures applicable to the sources through Maximum Available Control Technology (MACT) standards, rather than ambient standards.

**Major Sources:** Generally point sources that have the potential to emit over a certain number of tons of specified pollution per year and are regulated under Title 5. Often called a Title V source.

**Mobile Sources:** On-road and off-road vehicles, including trucks, cars, buses, motorcycles, airplanes, trains, farm and construction equipment, marine engines, and lawn mowers

**NAAQS:** *National Ambient Air Quality Standards* Standards or maximum levels set for the six criteria pollutants (PM, ozone, NO<sub>x</sub>, Sox, lead, and CO) in the ambient air as measure of whether an area is in “attainment” or “non-attainment” for air quality purposes.

**NO<sub>2</sub>:** *Nitrogen Oxide*

**SO<sub>2</sub>:** *Sulfur Oxide*

**Pb:** *Lead*

**O<sub>3</sub>:** *Ozone*

**CO:** *Carbon Monoxide*

**PM<sub>10</sub>:** *Particular matter less than 10 microns in size*

**PM<sub>2.5</sub>:** *Particulate matter less than 2.5 microns in size*

**NESHAP:** *National Emissions Standard for Hazardous Air Pollutants* National standards applicable to point and area sources of hazardous air pollutants.

**NSPS:** *New Source Performance Standards* EPA standards that apply to new point sources of air pollution.

**NSR:** *New Source Review* EPA rules that govern the construction and modification of stationary sources.

**NTAA:** *National Tribal Air Association* An organization for tribes to develop and participate on air policy issues in a similar manner as the State and Territorial Air Pollution Program Administrators/Association of Local Air Pollution Control Officials (STAPPA/ALAPCO).

**Point Sources:** Large, stationary sources of emissions that release pollutants in quantities above an emission threshold.

**PSD:** *Prevention of significant deterioration* A standard that prevents sources of pollution from causing a significant deterioration in the air quality in areas that meet the NAAQS.

**RPO:** *Regional Planning Organization* Organizations of federal, state, local, and tribal air quality managers who work on air policy issues for a particular region. Examples are the Western Regional Air Partnership (WRAP) and CENRAP (Central Regional Air Partnership).

**SIP:** *State Implementation Plan* State rules that have been approved by EPA and made part of the Code of Federal Regulations.

**TAR:** *Tribal Authority Rule* This 1998 rule establishes a flexible approach to tribal air quality management, a “modular” approach, allowing tribal governments to implement those provisions of the Clean Air Act that will address most effectively the air quality concerns of their individual reservations.

**TAS:** *Treatment in the Same Manner as a State* Also known as an “Eligibility Determination” for a tribe to exercise a authority under a particular CAA section, this process and approval requires that the tribe demonstrate that it: (1) is federally recognized; (2) has a governing body carrying out substantial governmental duties and powers; and (3) is capable of implementing the program consistent with the CAA and applicable regulations. The tribe must also identify the exterior boundaries of the reservation and, for non-reservation areas, must demonstrate the basis for jurisdiction.

**TIP:** *Tribal Implementation Plan* Tribal rules to manage air quality on a reservation that have been approved by EPA, entered into the Code of Federal Regulations and become federally enforceable.

**VOC:** *Volatile Organic Compounds*